



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 Broadway
New York, NY 10007-1866

August 12, 2022

ELECTRONIC MAIL

Mr. Chris W. Wenczel
ERM/Consulting Director/Hydrogeologist/Project Coordinator
105 Maxess Road, Suite 316
Melville, New York 11747-3851

Re: EPA Response on the PDI Progress Schedule Correspondence
New Cassel/Hicksville Groundwater Contamination Site - OU1
Unilateral Administrative Order (UAO) for a Remedial Design - Index No. CERCLA-02-2018-2015

Dear Chris,

The U.S. Environmental Protection Agency reviewed your letter dated August 5, 2022 and offers the following responses.

Request #1:

Extension for Submittal of the Draft PDI Directive 2 Technical Memorandum until 02 December 2022.

EPA Response:

Central Plume Group: EPA acknowledges that the Central Plume Group will complete field work for PDI Directive 2 but that the Central Plume Group is unable to meet the deadline for submittal of the PDI Directive 2 Technical Memorandum of 12 months after EPA's authorization to proceed with PDI Directive 2 (authorization to proceed – October 20, 2021) (see Amended SOW #1 ("SOW") Section 6.2.11.) because the Eastern Plume Group will not have finished the field work in the Eastern Plume in time for a timely submittal of the PDI Directive 2 Technical Memorandum. EPA acknowledges that the submittal of the PDI Directive 2 Technical Memorandum is a Common Work Element and thus cannot be finalized until all field work is completed.

Eastern Plume Group: The statement that "EPA expanded the scope of the approved October 2021 work plans" is misleading. Please note that vertical profiling was clearly specified in the PDI Workplan attached to the SOW for PDI-41/MW-41 and PDI-44/MW-44 (see Section 3.1(b)(2)(i) of the SOW). In addition, EPA informed the Eastern Plume Group in our June 6, 2021 correspondence that EPA will determine the next steps for MW-40 & 42 after results are received and evaluated from PDI-41/MW-41. During our March 1, 2022, site visit, we became aware that the Eastern Plume Group was not planning to perform the required vertical profiling for PDI-41/MW-41 as specified in the PDI Workplan, we then informed the Eastern Plume Group that vertical profiling was required for all the PDI borings and wells consistent with the work performed by the Central

Plume Group in the Central Plume and by EPA in the Western Plume.

It is EPA's position that the Eastern Plume Group had sufficient time to complete the required field work within the time period set forth in the SOW if not for the encountered equipment issues and field conditions. Please note that the use of a second rig from the Central Plume Group is still an alternative to speed up the field work.

Acknowledging that the PDI Directive 2 Technical Memorandum cannot be submitted until all field work is completed, EPA agrees to amend Section 6.2.11 of the SOW by extending the deadline for submission of the PDI Directive 2 Technical Memorandum to 12 months and 43 days after EPA's authorization to proceed with PDI Directive 2 which brings us to December 2, 2022, as requested by you in your letter.

Request #2:

Additional Eastern Plume Profiles Would Necessitate Extension for Submittal of the Draft PDI Directive 2 Technical Memorandum Until End of January 2023

EPA Response:

If EPA requires drilling and vertical profiling of PDI 40 and 42, the deadline for submission of the PDI Directive 2 Technical Memorandum will be January 31, 2023, or 12 months and 103 days after EPA's authorization to proceed with PDI Directive 2.

Request #3:

Extension for Submittal of the Draft PDI Directive 2 Recommendations Report until March 3, 2023

EPA Response:

As mentioned in your letter and as set forth in Section 6.2.12 of the SOW, Respondents are required to submit the PDI Directive 2 Recommendations Report 30 days after submission of the PDI Directive 2 Technical Memorandum. EPA acknowledges that this deliverable cannot be submitted until EPA issues the PDI Directive 1 Technical Memorandum Addendum (see Sections 3.1.b(1)(ii)(E) and 6.2.10 of the SOW) that will include the PDI Directive 1, Round 2 analytical data. EPA anticipates that it will perform the PDI Directive 1, Round 2 field work and finalize the Technical Memorandum Addendum within approximately 60 days of receipt of the PDI Directive 2 Technical Memorandum from the Central and Eastern Plume Groups. Therefore, EPA is hereby amending the deadline in Section 6.2.12 from 30 days after Respondent's submission of the PDI Directive 2 Tech Memo to 60 days after EPA's issuance of the PDI Directive 1 Technical Memorandum Addendum.

Finally, EPA rejects the GANTT chart you included as an attachment to your August 5, 2022, letter. The GANTT chart is inconsistent with the schedule set forth in Section 6.2 of the SOW. Note that the SOW schedule uses, among other things, EPA's issuance or approval of an action or document as a trigger for action whereas the GANTT assumes EPA will act by a particular date or in a prescribed number of days. EPA is not bound by such deadlines.

If you have any questions or comments regarding the above, please contact me at vazquez.julio@epa.gov or 212-637-4323.

Sincerely,

Julio F Vazquez

Julio F. Vazquez
Remedial Project Manager
New York Remediation Branch
Superfund and Emergency Management Division

cc: Alexandra Stark, Ensafe (via email)
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